

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

M.D., b/n/f Sarah R. Stukenberg, et al.,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as  
Governor of the State of Texas, et al.,

Defendants.

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Civil Action No. 2:11-CV-00084

**INITIAL WITNESS LIST FOR SHOW-CAUSE HEARING**

Pursuant to agreement of the parties, plaintiffs respectfully submit their designation of witnesses for the show-cause hearing that begins on December 4, 2023. Plaintiffs intend to call these witnesses to further demonstrate why defendants should be held in contempt and sanctioned or a receivership imposed. As the parties agreed, plaintiffs reserve their right to amend this list and call fewer or other witnesses, including those named on the defense witness list or identified in the parties' ongoing discovery proceedings. Plaintiffs designate the following witnesses to testify:

1. Erica Bañuelos, DFPS Assoc. Commissioner, Child Protective Services
2. Christopher Bellonci, M.D., concerning use, risks, and significance of psychotropic medications in foster care, DFPS Psychotropic Medication Utilization Parameters, DFPS oversight practices, resulting safety risks to children, related issues
3. Christie Carrington, fmr. DFPS supervisor in family-based safety services
4. Ora Chisom, fmr. DFPS Dir., Foster Care Litigation Compliance
5. Trisha Evans, fmr. Dir., C3 Christian Academy
6. Lindsey Dionne, attorney ad litem and fmr. DFPS Administrative Unit attorney
7. Cristina Guerrero, DFPS CPS, Residential Contract Dir. II for RCC Facilities on Heightened Monitoring
8. Jackie Juarez, fmr. PMC child
9. Kelsey Lammons, DFPS Contract Performance Manager

10. Gina Magliolo, DFPS conservatorship caseworker for PMC children
11. Viola Miller, fmr. Sec. of Cabinet for Ky. Families & Children and Comm'r of Tenn. Dep't of Children Servs., concerning risks and significance of abuse and neglect investigations in residential placements for developmentally delayed children, monitoring, management, and risks of psychotropic medications in foster care, risks and impact on children and caseworkers of Texas practices for placing foster children in unlicensed facilities, risks and significance of children understanding how to report abuse and neglect, risks and significance of timely notifying caregivers of children's sexual abuse or aggression history, related issues
12. Jamie Najera, DFPS Dep. Dir., Purchased Client Services
13. Audrey O'Neil, DFPS Deputy Commissioner for Programs
14. Stephen Pahl, HHSC Deputy Exec. Commissioner for Regulatory Services
15. Ashly Parratto, DFPS Foster Care Litig. Dir., Quality Assurance
16. Julie Pennington, attorney ad litem for PMC children
17. Hannah Reveile, fmr. DFPS conservatorship caseworker and CVS Specialist II
18. Marta Talbert, DFPS Assoc. Commissioner for Child Protective Investigations
19. Dr. Ryan Van Ramshorst, HHSC Chief Med. Dir., Medicaid/CHIP Services
20. Kason Vercher, DFPS Residential Contract Dir., Gen. RCC Facilities
21. Rebecca Weirether, HHSC Dir. Of Policy and Rules for Long-Term Care Regs.

Dated: December 4, 2023

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS AND THE GENERAL CLASS AND SUBCLASSES

#### **CERTIFICATE OF SERVICE**

I certify that on the 4<sup>th</sup> day of December, 2023, a true and correct copy of this document was served on all counsel of record via email.

/s/ R. Paul Yetter  
R. Paul Yetter